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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7957

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JUL 08 2004

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July 2, 2004

Mr. Joel Hebdon, Director
Regulatory Compliance and Analysis Division
United States Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, Washington 99352

Mr. Roy J. Schepens, Manager
Office of River Protection
United States Department of Energy
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Richland, Washington 99352

Mr. Keith A. Klein, Manager
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A7-50
Richland, Washington 99352

Mr. Richard H. Gurske, Director
Environmental Protection
Fluor Hanford, Inc.
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Richland, Washington 99352

Mr. Michael C. Hughes, President
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2435 Stevens Center Place
Richland, Washington 99352

Mr. J.P. Henschel, Project Director
Bechtel National, Inc.
2435 Stevens Center Place
Richland, Washington 99352

Mr. Roby D. Enge, Director
Environment, Safety, Health and Quality
Pacific Northwest National Laboratory
P.O. Box 999, MSIN: J2-38
Richland, Washington 99352

Ms. Susan J. Eberlein, Vice President
Environmental, Safety, Health and Quality
CH2M Hill Hanford Group, Inc.
P.O. Box 1500, MSIN: H6-03
Richland, Washington 99352

Dear Ms. Eberlein and Messrs. Hebdon, Schepens, Klein, Gurske, Hughes, Henschel, and Enge:

Re: Quarterly Notification of Class 1 Modifications to the Hanford Facility Resource
Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion,
(Quarter ending September 30, 2003-Permit Condition I.C.3)

The approved/denied quarterly modifications include:

Attachment 6: Hanford Well Maintenance and Inspection Plan:

Page 2: Attachment 6: List of Attachments: Denied.

Ms. Eberlein and Messrs. Hebdon, Gurske, Enge, Henschel, Schepens, and Klein
July 2, 2004
Page 2

Page 3: Attachment 6, Section 1.0: Denied. Retain language of last sentence. Other strike-outs okay.

Page 4: Attachment 6, Section 3.0: Denied. Request following language: "The schedule (Appendix A) is designed to be sufficiently flexible to meet permit and compliance conditions, accommodate changes that will occur with the addition of new wells, adjustments in the treatment, storage, and disposal unit closures, and wells that are no longer needed for monitoring. The schedule will also accommodate wells used by other programs."

Page 5: Attachment 6, Section 3.0: Denied. Request reference document and this document must meet Ecology approval. Other strike-outs okay.

Page 6: Attachment 6, Section 7.0: Denied. Request reference of document cited in Section 6.0.

305-B Storage Facility

Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit,

Condition III.2: Approved

Chapter 3.0: Approved

Section 3.1: Approved

Table 3-1: Approved

Table 8-1: Approved

Hanford Facility RCRA Permit, Condition II.U.3: Approved

Hanford Facility RCRA Permit, Condition II.V: Approved

Additionally, Ecology recognizes approval for Facility Class 1 Prime permit modifications to the Waste Treatment and Immobilization Plant (WTP) portion of the Hanford Facility RCRA Permit, Part III, Chapter 10, Attachment 51 submitted July 13, 2003, and August 29, 2003. These include:

Waste Treatment and Immobilization Plant

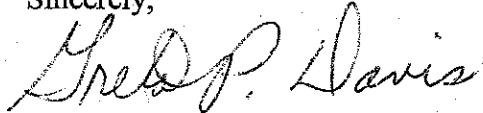
Hanford Facility RCRA Permit, Chapter 10: III.10.C.14

Appendix 1.0: Interim Compliance Schedule

Ms. Eberlein and Messrs. Hebdon, Gurske, Enge, Henschel, Schepens, and Klein
July 2, 2004
Page 3

The United States Department of Energy and contractor staff are encouraged to discuss proposed Class 1 changes with Ecology's unit managers to clarify any questions or concerns. If you have any questions or comments regarding this letter, please contact me at (509) 372-7894.

Sincerely,



Greta P. Davis
Hanford Sitewide RCRA Permit Coordinator
Nuclear Waste Program

GD:JV:nc
Enclosures

cc w/enc: Mike Hughes, BHI
Roger J. Landon, BHI
Richard H. Gurske, FH
Suzette Thompson, FH
Roby Enge, PNL
Alice Ikenberry, PNL
Stuart Harris, CTUIR
Pat Sobotta, NPT
Russell Jim, YN
Ken Niles, ODOE
Environmental Portal
HF Operating Record
Administrative Record

cc w/o enc: Rick Gay, CTUIR
Todd Martin, HAB

**Hanford Facility RCRA Permit Modification Notification Forms
Part III, Chapter 2 and Attachment 18
305-B Storage Facility**

Quarter Ending September 30, 2003

Page 1 of 6

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Page 2 of 6:	Hanford Facility RCRA Permit, Condition III.2.
Page 3 of 6:	Chapter 3.0
Page 4 of 6:	Chapter 3.0, Section 3.1
Page 5 of 6:	Chapter 3.0, Table 3-1
Page 6 of 6:	Chapter 8.0, Table 8-1

Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18

Description of Modification:

Hanford Facility RCRA Permit, Condition III.2.A:

III.2.A. COMPLIANCE WITH APPROVED PERMIT APPLICATION

The Permittees shall comply with all the requirements set forth in Attachment 18, including all Class 1 Modifications specified below, and the Amendments specified in Condition III.2.B. Enforceable portions of the permit application have been incorporated in Attachment 18 and are identified as follows. All subsections, figures, and tables included in these portions are also enforceable, unless stated otherwise:

ATTACHMENT 18:

- Chapter 1.0 Part A, Form 3, Permit Application, Revision 1C, from Class 1 Modification for quarter ending September 30, 2002
- Chapter 2.0 Unit Description, from Class 1 modification for quarter ending March 31, 2003
- Chapter 3.0 Waste Analysis Plan, from Class 1 Modification for quarter ending ~~June~~ September 30, 2003
- Chapter 4.0 Process Information, from Class 1 Modification for quarter ending September 30, 2002
- Chapter 6.0 Procedures to Prevent Hazards, from Class 1 Modification for quarter ending June 30, 2003
- Chapter 7.0 Building Emergency Procedure, from Class 1 Modification for quarter ending June 30, 2003
- Chapter 8.0 Personnel Training, from Class 1 Modification for quarter ending September 30, 2003~~2~~
- Chapter 11.0 Closure and Post-Closure Requirements, from Class 1 Modification for quarter ending September 30, 2002
- Chapter 12.0 Reporting and Recordkeeping, from Class 1 Modification for quarter ending September 30, 2002
- Chapter 13.0 Other Relevant Laws, from Class 1 Modification for quarter ending September 30, 2002

III.2.B. AMENDMENTS TO THE APPROVED PERMIT APPLICATION

- III.2.B.1. For all shipments of dangerous waste to or from this TSD unit, except for shipments which occur wholly within the 300 Area, the Permittees shall comply with Conditions II.P. and II.Q. of this Permit regarding dangerous waste shipment manifesting and transportation.

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			
Relevant WAC 173-303-830, Appendix I Modification: A.1.				
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation</u>				
A. General Permit Provisions				
1. Administrative and Informational changes				
Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:	Reviewed by Ecology:	
<i>A.K. Ikenberry</i> 9-11-03	<i>R.F. Christensen</i> 9/16/03	<i>F. Jamison</i> 8/29/04	<i>E.R. Skinnarland</i> 2/25/04	
A.K. Ikenberry Date	R.F. Christensen Date	F. Jamison Date	E. R. Skinnarland Date	

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form				
Unit: 305-B Storage Facility	Permit Part & Chapter: Part III, Chapter 2 and Attachment 18			
Description of Modification: Chapter 3.0: Replace Chapter 3.0 with the attached Chapter 3.0. Replaced 'RMW' with 'mixed waste'.				
Modification Class: ¹²³ Please check one of the Classes:	Class 1 X	Class ¹ 1	Class 2	Class 3
Relevant WAC 173-303-830, Appendix I Modification: A.1.				
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation</u> A. General Permit Provisions 1. Administrative and Informational changes				
Submitted by Co-Operator: <i>A.K. Ikenberry</i>	Reviewed by RL Program Office: <i>R.F. Christensen</i>	Reviewed by Ecology: <i>F. Jamison</i>	Reviewed by Ecology: <i>E. R. Skinnarland</i>	
A.K. Ikenberry Date 9-11-03	R.F. Christensen Date 9/14/03	F. Jamison Date 9/14/03	E. R. Skinnarland Date 2/25/04	

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18

Description of Modification:

Chapter 3.0, Section 3.1: Replace Chapter 3.0 with the attached Chapter 3.0.

3.1 CHEMICAL, BIOLOGICAL, AND PHYSICAL ANALYSIS

The dangerous waste and mixed waste stored at 305-B Storage Facility can be categorized as originating from five basic sources:

- Listed Waste from specific and nonspecific sources
- Discarded commercial chemical products
- ~~Waste from research activities using radioactive isotopes~~
- Mixed Waste from Research Activities
- Waste from chemicals synthesized or created in research laboratories
- Discarded commercial products exhibiting dangerous waste characteristics and/or criteria.

...

Mixed Waste from Research Activities Using Radioactive Isotopes. Dangerous or mixed wastes from can be generated by research and analytical activities using radioactive isotopes are RMW. These wastes are generated in laboratories performing chemical and physical research, and consist primarily of radiologically contaminated chemicals. These wastes are designated on the basis of the generator's knowledge or on the basis of sampling and analysis. The generator's knowledge is used if the generator has kept accurate records of the identities and concentrations of constituents present in the waste. For example, many generating units keep log sheets for accumulation containers in satellite areas to keep a record of waste constituents. If information available from the generator is inadequate for waste designation, the wastes are sampled and the results of the analysis are used for designation. These wastes include those designated as state only dangerous waste under WAC 173-303-100 and also those designated as characteristic dangerous waste under WAC 173-303-090. Attachment 18, Chapter 1.0, Part A, Form 3, includes all categories of toxic, and persistent, waste (i.e., both DW and EHW). The wide variety of research activities conducted at Hanford presents the potential that these wastes could be generated and requires subsequent management at 305-B Storage Facility. Similarly, Attachment 18, Chapter 1.0, Part A, Form 3, includes the characteristic dangerous waste categories D001 through D043 (i.e., ignitable, corrosive, reactive, and TCLP toxic due to metals or organics content).

Modification Class: ¹²³

Please check one of the Classes:

Class 1

Class ¹1

Class 2

Class 3

X

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation

B. General Permit Provisions

1. Administrative and Informational changes

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
<i>A.K. Ikenberry</i> 10/23/03	<i>R.F. Christensen</i> 10/24/03	<i>F.L. Jamison</i> 10/24/03	<i>J.P. Dennis</i> 2/25/04
A.K. Ikenberry Date	R.F. Christensen Date	F. Jamison Date	R. Skinnerland Date

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18

Description of Modification:

Chapter 3.0, Table 3-1: Replace Chapter 3.0 with the attached Chapter 3.0.

Table 3-1. Summary of Test Parameters, Rationales, and Methods

Parameter ^a	Method ^b	Rationale for Selection
Physical Screening		
Visual inspection	Field method - observe phases, presence of solids in waste	Confirm that waste matches that described on waste acceptance documentation; identify waste prohibited by LDR requirements related to downstream TSD unit acceptance criteria
Chemical Screening		
Water miscibility/separable organics ^c	Water mix screen ASTM Method D5232-92	Confirm that waste matches that described on waste acceptance documentation; identify separable organics; identify waste prohibited by LDR requirements related to downstream TSD unit acceptance criteria
Oxidizer	Oxidizer Screen	Confirm that waste matches that described on waste acceptance documentation; ensure compliance with WAC 173-303-395(1)(b)
pH	pH screen SW-846 Method 9041	Confirm that waste matches that described on waste acceptance documentation; ensure compliance with WAC 173-303-395(1)(b)
Cyanides	Cyanide screen	Confirm that waste matches that described on waste acceptance documentation; ensure compliance with WAC 173-303-395(1)(b)
Sulfides	Sulfide screen	Confirm that waste matches that described on waste acceptance documentation; ensure compliance with WAC 173-303-395(1)(b)
Flashpoint	Flashpoint measurement instrument	Confirm that waste matches that described on waste acceptance documentation
Halogenated/Volatile Organic Compounds	Photoionizer or Flame Ionizer, or Clor-D-Tect © Kits	Confirm that waste matches that described on waste acceptance documentation
Pre-shipment Review		
Mercury (total)	Generator knowledge or SW-846 Method 7470/7471	Identify waste prohibited by LDR requirements related to downstream TSD unit acceptance criteria.
Toxicity characteristic organic compounds	Generator knowledge or SW-846 Methods 1311 and 8260 (volatile organic compounds) and 8270 (semivolatile organic compounds)	Identify waste not identified on the Part A, Form 3
Polycyclic aromatic hydrocarbons	Generator knowledge or SW-846 Method 8270 or 8100	Identify waste not identified on the Part A, Form 3 (for waste with >1% solids and for which WP03 could apply)

^a Addition parameters can be used on current waste acceptance criteria of the downstream TSD unit. Operation limits transfer/shipments are based on current waste acceptance criteria.

^b Procedures based on EPA SW-846, unless otherwise noted. When regulations require a specific method, the method shall be followed.

^c These test will not be performed on materials known to be organic peroxides, ether, and/or water reactive compounds.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹ 1	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation

C. General Permit Provisions

1. Administrative and Informational changes

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
<i>A.K. Ikenberry</i> 9-1-03	<i>R.F. Christensen</i> 9/16/03	<i>F. Jamison</i> 9/25/04	<i>E.R. Skinnarland</i> 2/25/04
A.K. Ikenberry Date	R.F. Christensen Date	F. Jamison Date	E.R. Skinnarland Date

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18

Description of Modification:

Chapter 8.0, Table 8-1: Replace Chapter 8.0 with the attached Chapter 8.0

Table 8-1. 305-B Storage Facility Training Matrix

Attachment 33, General Information Portion, Chapter 8.0 Training (DOE/RL-91-28) Category	Training Category*				
	General Hanford Facility Training	Contingency Plan Training	Emergency Coordinator Training	Operations Training	
305-B Storage Facility	Orientation Program	Building Emergency Plan	Building Emergency Director Training	Advanced Waste Management Training	Container Management
Staff Position					
Technical Group Lead Unit Operations Supervisor	X	X	X	X	X
Hazardous Waste Operations Staff/Waste Management Engineers	X	X	X ¹	X	X
Waste Management Technicians and Scientist/Engineering Associates	X	X	X ¹	X	X
Waste Management Clerks	X	X		X	

¹ Required for any staff that has been assigned the duties of Building Emergency Director or alternate.

* Refer to the 305-B Storage Facility Training Plan for a complete description of coursework in each training category.

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation

A. General Permit Provisions

1. Administrative and Informational changes

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
<i>A.K. Ikenberry</i> 9-11-03	<i>R.F. Christensen</i> 9/14/03	<i>F. Jamison</i> 9/14/03	<i>M.P. Davis</i> 2/25/04
A.K. Ikenberry Date	R.F. Christensen Date	F. Jamison Date	M.P. Davis Date

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

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Hanford Facility RCRA Permit Modification Notification Forms

List of Attachments

Quarter Ending September 30, 2003

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Page 5 of 6: Attachment 6, Section 6.0
Page 6 of 6: Attachment 6, Section 7.0

Hanford Facility RCRA Permit Modification Notification Form

Unit:
Attachment 6Permit Part & Chapter:
List of AttachmentsDescription of Modification:

Remove Attachment 6 and replace with the attached Attachment 6.

LIST OF ATTACHMENTS

Attachment 6 Hanford Well Maintenance and Inspection Plan (as amended), BHI-01265, Revision 0, May 1999

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes

Submitted by Co-Operator:	Reviewed by DOE Program Office:	Reviewed by Ecology:
<i>R. T. Wilde</i> 9-23-03	<i>Shirley Lee</i> 10-8-03	
R. T. Wilde	M. S. McCormick	E. R. Skinnarland
Date	Date	Date

¹ Class 1 modifications requiring prior Agency approval.² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
Attachment 6Permit Part & Chapter:
List of AttachmentsDescription of Modification:

Remove Attachment 6 and replace with the attached Attachment 6.
Attachment 6

1.0 INTRODUCTION

This document presents the well maintenance and inspection plan for use in supporting groundwater activities at the Hanford Site. Wells located across the Hanford Site are used by Site contractors for a variety of groundwater programs. As such, these wells require various types of maintenance during their lifecycles. The wells that must be maintained are defined in Section 2.0, Requirements, ~~defines wells that must be maintained.~~ The Well Maintenance Program is the responsibility of Bechtel Hanford, Inc. (BHI). ~~The maintenance/inspection program is designated as routine maintenance.~~

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:**A. General Permit Provisions****1. Administrative and Informational changes**

Submitted by Co-Operator: <i>R.T. Wilde</i>	Reviewed by DOE Program Office: <i>Shirley Lee</i>	Reviewed by Ecology:
<i>9-23-03</i>	<i>10-8-03</i>	
R. T. Wilde	M. S. McCormick	E. R. Skinnarland
Date	Date	Date

¹ Class 1 modifications requiring prior Agency approval.² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:

Attachment 6

Permit Part & Chapter:

List of Attachments

Description of Modification:

Attachment 6

3.0 SCHEDULE

The list of wells to be considered for routine maintenance is developed based on a review of the past 4 years sampling history, the fiscal year sampling schedule, and the proposed 3-year sampling schedule. Routine maintenance priority is established by reviewing the following:

- Whether the well is subject to RCRA permit requirements, or
- Elapsed time since the last routine maintenance action or construction date (priority on longer duration).

The schedule, which (see Appendix A) is generated, tracked and formulated by the Hanford Well Information System (HWIS), and consists of a schedule that is sufficiently flexible to accommodate changes that will occur with the addition of new wells, adjustments in the TSD unit closures, and wells that are no longer needed for monitoring. The schedule will also accommodate wells used by other programs.

Modification Class: ¹²³

Class 1

Class ¹1

Class 2

Class 3

Please check one of the Classes:

X

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes

Submitted by Co-Operator: <i>R. T. Wilde</i> 9-23-03	Reviewed by DOE Program Office: <i>M. S. McCormick</i> 10-8-03	Reviewed by Ecology:
R. T. Wilde	M. S. McCormick	E. R. Skinnarland
Date	Date	Date

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
Attachment 6

Permit Part & Chapter:
List of Attachments

Description of Modification:

Remove Attachment 6 and replace with the attached Attachment 6.
Attachment 6

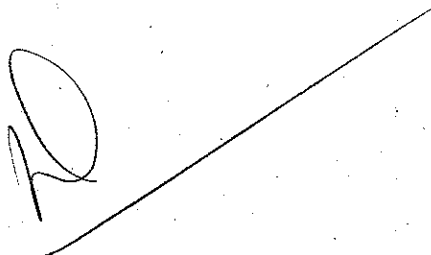
6.0 MANAGEMENT AND CONTROL

Well maintenance activities will be performed by subcontract using approved subcontractor procedures, quality assurance and quality control plans, health and safety plan, and other appropriate and/or required documentation. Program environmental requirements documents are used to evaluate the adequacy of subcontractor procedures and plans to guide and control the well maintenance activities. Program implementation and procedural compliance will be monitored periodically through surveillance and self-assessments. ~~The following will control environmental compliance, quality assurance, and reporting:~~

~~BHH EE-02, Program Environmental Requirements, documents establishes the overall environmental compliance requirements for BHH.~~

~~Program implementation and procedural compliance will be monitored periodically through surveillance and self-assessments.~~

Well maintenance activities will be documented and transmitted for entry into the ~~HWIS~~ Hanford Well Information System Database. Inspections ~~are to~~ will be recorded in the RCRA operating records, where necessary. All documentation shall be submitted to the Hanford Facility Operating Record, Unit-Specific file ~~Document and Information Services.~~




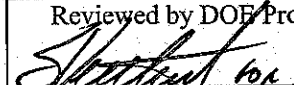
Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes

Submitted by Co-Operator:  R. T. Wilde	Reviewed by DOE Program Office:  M. S. McCormick	Reviewed by Ecology: E. R. Skinnarland
9-23-03 Date	10-8-03 Date	 Date

¹ Class 1 modifications requiring prior Agency approval.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
Attachment 6

Permit Part & Chapter:
List of Attachments

Description of Modification:

Remove Attachment 6 and replace with the attached Attachment 6.
Attachment 6

7.0 REFERENCES

BHI-EE-02, *Environmental Requirements*, Bechtel Hanford, Inc., Richland, Washington.

DOE-RL, Hanford Facility Wide RCRA Permit, as revised, Permit No. WA7890008967, expiration date September 27, 2004.

Resource Conservation and Recovery Act of 1976, 42 U.S.C. 6901, et seq.

RCW 18.104, "Well Construction," *Revised Code of Washington*, as amended.

RCW 70.105, "State of Washington Hazardous Waste Management Act of 1976," *Revised Code of Washington*, as amended.

WAC 173-160, "Minimum Standards for Construction and Maintenance of Wells," *Washington Administrative Code*, as amended.

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes

Submitted by Co-Operator:	Reviewed by DOE Program Office:	Reviewed by Ecology:
9-23-03	10-8-13	
R. T. Wilde	M. S. McCormick	E. R. Skinnarland
Date	Date	Date

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Hanford Facility RCRA Permit Modification Notification Forms

List of Attachments

Quarter Ending September 30, 2003

Replacement

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Attachment 6

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The schedule, which is tracked and formulated by the Hanford Well Information System (HWIS), is sufficiently flexible to accommodate changes that will occur with the addition of new wells, adjustments in the TSD unit closures, and wells that are no longer needed for monitoring. The schedule will also accommodate wells used by other programs.

4.0 WELL INSPECTIONS

Well inspections are conducted as an integral part of field maintenance activities. Inspections include visual examination of the well site, surface components of the well structure (e.g., barrier posts, concrete surface pad, protective well casing, well cap), identification of equipment installed in the well, and where possible measurements of the depths to water and/or bottom of the well. Inspections are documented on field reports.

5.0 WELL MAINTENANCE

Well maintenance for groundwater monitoring wells at a minimum will include the following tasks:

1. Removing groundwater sampling pump system and/or aquifer testing instrumentation/equipment
2. Inspecting and repairing (or replacing, as necessary) the sampling pump system and/or aquifer testing instrumentation/equipment
3. Brushing/cleaning the well casing perforations/well screen
4. Removing debris and fill material
5. Developing the well
6. Performing borehole video camera surveillance
7. Re-installing sampling and/or aquifer testing instrumentation/equipment
8. Documenting well conditions and maintenance activities
9. Performing well inspections, as defined in Section 3.0 of this well maintenance and inspection plan.

6.0 MANAGEMENT AND CONTROL

Well maintenance activities will be performed by subcontract using approved subcontractor procedures, quality assurance and quality control plans, health and safety plan, and other appropriate and/or required documentation. Program environmental requirements documents are used to evaluate the adequacy of subcontractor procedures and plans to guide and control the well maintenance activities. Program implementation and procedural compliance will be monitored periodically through surveillance and self-assessments.

Well maintenance activities will be documented and transmitted for entry into HWIS. Inspections will be recorded in the RCRA operating records, where necessary. All documentation shall be submitted to the Hanford Facility Operating Record, Unit-Specific file.

7.0 REFERENCES

DOE-RL, *Hanford Facility Wide RCRA Permit, as revised, Permit No. WA7890008967*, expiration date September 27, 2004.

Resource Conservation and Recovery Act of 1976, 42 U.S.C. 6901, et seq.

HANFORD WELL MAINTENANCE AND INSPECTION PLAN

1.0 INTRODUCTION

This document presents the well maintenance and inspection plan for use in supporting groundwater activities at the Hanford Site. Wells located across the Hanford Site are used by Site contractors for a variety of groundwater programs. As such, these wells require various types of maintenance during their lifecycles. The wells that must be maintained are defined in Section 2.0, Requirements defines wells that must be maintained.

2.0 REQUIREMENTS

The *Revised Code of Washington* ([RCW] 18.104), as amended, states that the property owner is required to maintain wells to guard against waste and contamination of the groundwater resources. In addition, RCW 18.104 empowers the Washington State Department of Ecology (Ecology) to adopt rules for the maintenance of wells and their casings. These rules and regulations are contained in *Washington Administrative Code* (WAC) 173-160, "Minimum Standards for Construction and Maintenance of Wells," issued by Ecology.

The provisions of the dangerous waste section of the *Resource Conservation and Recovery Act of 1976 Permit for the Treatment, Storage, and Disposal of Dangerous Waste at the Hanford Site* Permit are controlled by the "State of Washington Hazardous Waste Management Act of 1976" (RCW 70.105). Part II.F.2.a of Ecology 1994 states *...the Permittees shall inspect the integrity of active resource protection wells as defined by WAC 173-160-030 subject to this Permit at least once every five (5) years.* Wells subject to the RCRA Permit requirements are defined as wells actively monitoring treatment, storage, and disposal (TSD) unit closures (in Part V of the Permit); TSD operating units (in Part III of the Permit); and TSD units undergoing post-closure/modified closure (Part VI of the Permit).

Additionally, the "Second Responsiveness Summary" section (Ecology 1994), which discusses interpretation of the RCRA Permit (found in Part II.F.2.a, page 99), states that Ecology requires maintenance inspections because of the likelihood that monitoring wells can act as preferential pathways for the migration of contaminants. Although the inspections are only required for the wells subject to the Permit, Ecology further states that *...the Department will pursue enforcement action outside of this Permit to assess and remediate and/or abandon, where applicable, those wells not being addressed by this Permit.*

Groundwater monitoring wells included in the maintenance/inspection plan are determined by the RCRA permit and various programs such as the Hanford Site Groundwater/Vadose Zone Integration Project. Maintenance of wells supporting other programs or projects across the Hanford Site may be included in the maintenance schedule at the request of the program manager.

3.0 SCHEDULE

The list of wells to be considered for routine maintenance is developed based on a review of the past 4 years sampling history, the fiscal year sampling schedule, and the proposed 3-year sampling schedule. Routine maintenance priority is established by reviewing the following:

- Whether the well is subject to RCRA permit requirements, or
- Elapsed time since the last routine maintenance action or construction date (priority on longer duration).

- 1 RCW 18.104, "Well Construction," *Revised Code of Washington*, as amended.
- 2 RCW 70.105, *State of Washington Hazardous Waste Management Act of 1976, Revised Code of*
- 3 *Washington*, as amended.
- 4 WAC 173-160, *Minimum Standards for Construction and Maintenance of Wells, Washington*
- 5 *Administrative Code*, as amended.

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Hanford Facility RCRA Permit Modification Notification Forms

General Permit Conditions

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Page 3 of 3: Permit Condition II.V

Hanford Facility RCRA Permit Modification Notification Form

Unit:
Hanford Facility RCRA Permit

Permit Part & Chapter:
Part II, General Conditions

Description of Modification:

Permit Condition II.U.3:

This modification updates the conditions to reflect the current status of mapping efforts.

II.U.3 The Permittees shall maintain piping maps for existing, newly identified, and/or new dangerous waste underground pipelines (including active, inactive, and abandoned pipelines, which contain or contained dangerous waste subject to the provisions of Chapter 173-303 WAC) at the Hanford Facility within the 200 East, 200 West, 300, 400, 100N, and 100K Areas. The maps shall identify the origin, destination, direction of flow, size, depth and type (i.e., reinforced concrete, stainless steel, cast iron, etc.), of each pipe, and the location of their diversion boxes, valve pits, seal pots, catch tanks, receiver tanks, and pumps, and utilize Washington State Plane Coordinates, NAD 83(91), meters. If the type of pipe material is not documented on existing drawings, the most probable material type shall be provided. The maps shall also identify whether the pipe is active, inactive, or abandoned. The age of all pipes requiring identification pursuant to this Condition shall be documented in an Attachment to the submittal. If the age cannot be documented, an estimate of the age of the pipe shall be provided based upon best engineering judgment. These maps need not include the pipes within a fenced tank farm or within a building/structure. These maps shall be compiled using documented QA/QC control methods and procedures outlined in DOE/RL-96-50, Hanford Facility RCRA Permit Mapping and Marking of Dangerous Waste Underground Pipelines Report, September 1996. These maps and any Attachments shall be maintained in the Facility Operating Record and be updated annually as required by Condition II.U.4.

Modification Class: ¹²³

Please check one of the Classes:

Class 1

Class ¹1

Class 2

Class 3

X

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation

A. General Permit Provisions

1. Administrative and Informational changes.

Submitted by Co-Operator:

Reviewed by RL Program Office

Reviewed by Ecology:

R. H. Gurske

Date

J. B. Hebdon

Date

E. R. Skinnarland

Date

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit: Hanford Facility RCRA Permit	Permit Part & Chapter: Part II, General Conditions
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Description of Modification:

Permit Condition II.V

*This modification updates the conditions to reflect the current status of mapping efforts.***II.V MARKING OF UNDERGROUND PIPING**

The Permittees shall maintain marking of underground pipelines located outside the 200 East, 200 West, 300, 400, 100N, and 100K Areas identified in Condition II.U.3. These pipelines shall be marked at the point they pass beneath an area fence enclosing the 200 East, 200 West, 300, 400, 100N, or 100K Areas, at their origin and destination, at any point they cross an improved road, and every 100 meters along the pipeline corridor where practicable. The markers shall be labeled with a sign that reads "Buried Dangerous Waste Pipe" and shall be visible from a distance of fifteen (15) meters.

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation

A. General Permit Provisions

1. Administrative and Informational changes.

Submitted by Co-Operator: <i>R. H. Gurske</i> 15 Sept 03 R. H. Gurske Date	Reviewed by RL Program Office <i>J. B. Hebdon</i> 10/9/03 J. B. Hebdon Date	Reviewed by Ecology: <i>E. R. Skinnarland</i> 2/25/04 for E. R. Skinnarland Date
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¹ Class 1 modifications requiring prior Agency approval.² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form				
Unit: Hanford Facility RCRA Permit		Permit Part & Chapter: Part II, General Conditions		
Description of Modification: Permit Condition II.U.2 II.U.2 <u>Permittees shall maintain current all maps required by Condition II.U.1. These maps will be updated to incorporate new or revised information available by March 30th of each year. By September 30th of each year, the Permittees shall submit to Ecology a list of maps that have been updated. The updated maps (including any Attachments) and the annual list submitted to Ecology shall be maintained in the Facility Operating Record.</u>				
<p style="font-size: 2em; transform: rotate(-15deg);">Check to see if done but chg II U. 1</p> <p style="font-size: 1.5em; transform: rotate(-15deg);">II.U.2 Deleted</p>				
Modification Class: ^{12.3}		Class 1	Class ¹ 1	Class 2
Please check one of the Classes:		X		
Relevant WAC 173-303-830, Appendix I Modification: A.1.				
Enter wording of the modification from WAC 173-303-830, Appendix I citation				
A. General Permit Provisions				
1. Administrative and Informational changes.				
Submitted by Co-Operator:		Reviewed by RL Program Office:		Reviewed by Ecology:
R. H. Gurske	Date	J. B. Hebdon	Date	L. E. Ruud
				Date

Deleted: By September 29, 1997, the Permittees shall make an initial submittal to Ecology of maps showing the location of dangerous waste underground pipelines (including active, inactive, and abandoned pipelines which contain or contained dangerous waste subject to the provisions of Chapter 173-303 WAC), on the Facility, which are located outside of the fences enclosing the 200 East, 200 West, 300, 400, 100N, and 100K Areas. These maps shall identify the origin, destination, size, depth, and type (i.e., reinforced concrete, stainless steel, cast iron, etc.), of each pipe and the location of their diversion boxes, valve pits, seal pots, catch tanks, receiver tanks, and pumps, utilizing Washington State Plane Coordinates, NAD 83(91), meters. If the type of pipe material is not documented on existing drawings, the most probable material type shall be provided. These maps shall be accompanied by a description of the QA/QC control measures used to compile the maps.

Deleted: The age of all pipes required to be identified pursuant to this Condition, shall be documented in an Attachment to the submittal. If the age cannot be documented, an estimate of the age of the pipe shall be provided, based upon best engineering judgment.

Deleted: These maps, and any Attachments, shall be maintained in the Facility Operating Record and updated annually, after the initial submittal, with new or revised information. Each map submittal required by this Condition shall incorporate information available six (6) months before the scheduled submittal date.

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix 1, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Deleted: By September 28, 1998, the Permittees shall make an initial submittal, to Ecology, of maps showing the location of dangerous waste underground pipelines (including active, inactive, and abandoned pipelines, which contain or contained dangerous waste, subject to the provisions of Chapter 173-303 WAC) within the 200 East, 200 West, 300, 400, 100N, and 100K Areas. These maps will incorporate information available six (6) months prior to the scheduled submittal date. Thereafter, the maps will be updated on an annual basis to incorporate additional information, as such information becomes available in accordance with the FFACO milestone schedule. A schedule for the provision of map input shall be included in the report specified in Condition I.U.1. ¶ The maps shall identify the origin, destination, size, depth and type (i.e., reinforced concrete, stainless steel, cast iron, etc.), of each pipe, and the location of their diversion boxes, valve pits, seal pots, catch tanks, receiver tanks, and pumps, and utilize Washington State Plane Coordinates, NAD 83(91), meters. If the type of pipe material is not documented on existing drawings, the most probable material type shall be provided. These maps need not include the pipes within a fenced tank farm or within a building/structure. These maps shall be accompanied by a description of the QA/QC control used to compile the maps. ¶ The age of all pipes required to be identified pursuant to this Condition shall be documented in an Attachment to the submittal. If the age cannot be documented, an estimate of the age of the pipe shall be provided based upon best engineering judgment. ¶ These maps, and any Attachments, shall be maintained in the Facility Wide Operating Record and updated annually, after the initial submittal, with new or revised information.

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class '1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to '1', if appropriate.